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February 9, 2012

Mr. Christopher Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE:Response to RFAI on 2010 Year End Report
League of Conservation Voters, Inc.: C90005786 (LCV)

Dear Mr. Whyrick:

The following is in response to your letter of January 5, 2012 regarding certain independent expenditures made by the League of Conservation Voters, Inc. (LCV) during the fourth quarter of 2010.

1.You requested information regarding a 48-hour report filed by LCV on October 11, 2010 disclosing an independent expenditure of \$4,995 on October 10, 2010 and an explanation as to why it did not appear on LCVs 4th Quarter report. While the attachment to your letter indicates that this expense was related to Paul Hodes, LCVs records confirm that this independent expenditure was made in support of Tom Perriello. On October 11, 2010, LCV filed with the FEC a 48-hour report disclosing an estimated independent expenditure to Mission Control for \$4,995 as part of our efforts to support the candidacy of Tom Perriello. However, this estimated \$4,995 payment was never actually spent because Mission Control had over-estimated the costs (LCV separately reported two payments to Mission Control on its 4th Quarter report). As a result, the \$4,995 was not reported on LCVs Year-End report filed on January 31, 2011. LCV would note that Form 5, unlike Form 3X, does not report ongoing receipts/disbursements or reconciliation, nor does it instruct filers to list voided transactions previously reported on 24/48 reports.

2.You have requested information regarding 14 independent expenditures reported on LCVs 4th Quarter 2010 Form 5 report in relation to 24 and 48 hour reports. We provide an individual response to each below, but to summarize:

a.In five instances, LCV correctly reported the information as part of a 24 or 48 hour report or did not report the expense on a 24 or 48 hour report because no such reporting threshold had been triggered.

b.In four instances, the expenses were disclosed to the FEC and the public on 24 or 48 hour reports, but due to administrative errors these disclosures were incorrectly reported by LCVs connected PAC, the League of Conservation Voters Action Fund (LCV Action Fund). Once these issues were identified, LCV correctly reported the expenses as part of LCVs 4th Quarter Form 5 report. While these issues were identified shortly after the election, since RAD does not encourage filing amended 24 hour reports after an election, LCV determined that it should report the correctly characterized amounts on its subsequent quarterly report.

c.In five instances, smaller independent expenditures amounting to an aggregate total of \$2442.17 tied to LCV canvass operations were not reported on 24-hour reports. This failure to report small independent expenditures pertaining to pizza, parking, and allocations of partial salaries for joint canvass operations is attributable to administrative oversights on LCVs part that did not become apparent until after the time for filing the reports was passed. Once these issues were identified, LCV correctly reported the expenses on its 4th Quarter Form 5 report. While these issues were identified shortly after the election, since RAD does not encourage filing amended 24 hour reports after an election had occurred, LCV determined it should report missed expenses on its subsequent quarterly report.

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What follow are specific responses to each of the fourteen independent expenditure noted in the attachment to the January 5th letter. We would note that many of the entries for candidate name and purpose provided in the attachment to the January 5th letter contain incorrect information. In such instances, LCV has indicated below both the information contained in the RFAI letter to LCV, as well as the corrected information.

(1)Salary payment in the amount of \$960.00 to Brian Clark on 10/15/2010 in support of candidate Paul Hodes. The expenditure was correctly reported by LCV on its Year End report, but due to an administrative oversight, LCV did not include this expense as part of the 24-hour report it filed for this race and time period.

(2)Salary payment in the amount of \$1,400.00 to John Burton on 10/15/2010 in support of Paul Hodes. LCV correctly reported the expense on its Year End report, but due to an administrative oversight, LCV did not include this expense as part of the 24-hour report it filed for this race and time period.

NOTE: The RFAI indicated that this expense was for gas in support of candidate Ann McLane Kuster; LCVs records and LCVs

Year End report confirm that this expense was for a salary payment in support of Paul Hodes.

(3)Payment for field consulting services in the amount of \$2,046.00 to Grassroots Campaigns, Inc. on 10/28/2010 in support of candidate Bryan Lentz. LCV correctly reported this expense on the LCV Year End report, but due to an administrative error, the wrong LCV entity (LCV Action Fund) disclosed this expense in a 24-hour report filed on 10/29/2010.

NOTE: The RFAI indicated that this expense was for canvasser in support of Paul Hodes; LCVs records and the LCV Year End report found on the FEC website confirm that this expense was for field consulting services in support of candidate Bryan Lentz.

(4)Payment for field consulting services in the amount of \$2,046.00 to Grassroots Campaigns, Inc. on 10/28/2010 in support of candidate Patrick Murphy. LCV correctly reported this expense on the LCV Year End report, but due to an administrative error, the wrong LCV entity (LCV Action Fund) disclosed this expense in a 24-hour report filed on 10/29/2010.

NOTE: The RFAI indicated that this expense was for canvasser in support of Ann McLane Kuster; LCVs records and the LCV Year End report found on the FEC website confirm that this expense was for field consulting services in support of candidate Patrick Murphy.

(5)Payment for field consulting services in the amount of \$16,368.00 to Grassroots Campaigns, Inc. on 10/28/2010 in support of candidate Joseph Sestak. LCV correctly reported this expense on the LCV Year End report, but due to an administrative error, the wrong LCV entity (LCV Action Fund) disclosed this expense in a 24-hour report filed on 10/29/2010.

NOTE: The RFAI indicated that this expense was for canvasser in support of Carol Shea-Porter. LCVs records and the LCV Year End report found on the FEC website confirm that this expense was for field consulting services in support of candidate Joseph Sestak.

(6)Payment for GOTV calls in the amount of \$13,750 to Winning Connections on 10/29/2010 in support of candidate James Himes. LCV reported an estimate of \$13,000.00 for this expense in a 24-hour report on 10/28/2010. The LCV Year End report conveyed the actual amount of this expense as \$13,750.00.

NOTE: The RFAI indicated that this expense was for canvasser in support of candidate Ann McLane Kuster. LCVs records and the LCV Year End report found on the FEC website confirm that this expense was for GOTV calls in support of James Himes.

(7)Salary payment in the amount of \$720.00 to Carleena Seeba on 10/30/2010 in support of candidate Michael Bennet. LCV correctly reported this expense in a 24-hour report for candidate Michael Bennet filed on 10/31/2010. This expense was again reported

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on the LCV Year End report.

NOTE: The RFAI indicated that this expense was for canvasser in support of candidate Carol Shea-Porter. LCV records, LCVs 24-hour report for Bennet on 10/30/2010, and LCVs Year End report confirm that this expense was a salary payment in support of Michael Bennet.

(8)Payment for food for canvassers in the amount of \$37.20 to Denver Pizza Company on 10/30/2010 in support of Michael Bennet. The expenditure was correctly reported in the LCV Year End report, but due to an administrative error, LCV did not include this expense when it filed its 24-hour report on 10/31/2010 for this race.

NOTE: The RFAI indicated that this expense was for canvasser in support of candidate Ann McLane Kuster. LCV records and the LCV Year End report confirm that this expense was a payment for food for canvassers in support of Michael Bennet.

(9)Salary payment in the amount of \$350.00 to John Burton on 10/30/2010 in support of Carol Shea-Porter. This expense was correctly reported on LCVs Year End report. This expense combined with other expenses in this race did not trigger the \$1,000 threshold necessary to trigger a 24-hour report.

NOTE: The RFAI indicated that this expense was for canvasser in support of candidate Michael Bennet. LCV records and the LCV Year End report confirm that this expense was a salary payment in support of Carol Shea-Porter. Shea-Porter did not require a 24-hour report for this expense.

(10)Salary payment in the amount of \$1,050.00 to Kelley Meck on 10/30/2010 in support of Michael Bennet. This expense was reported in a 24-hour report for Bennet filed on 10/31/2010. It was also reported on LCVs Year End report.

(11)Payment for food in the amount of \$6.95 to Kroger on 10/30/2010 in support of Tom Perriello. LCV correctly reported this expense on the LCV Year End report, but due to an administrative oversight, LCV did not include this expense when it filed its 24-hour report on 10/31/2010 for this race.

NOTE: The RFAI indicated that this expense was for canvasser in support of Michael Bennet. LCV records and the LCV Year End report confirm that this expense was payment for food in support of candidate Tom Perriello.

(12)Payment for parking in the amount of \$38.00 to LAZ Parking on 10/30/2010 in support of Tom Perriello. LCV correctly reported this expense on the LCV Year End report, but due to an administrative oversight, LCV did not include this expense when it filed its 24-hour report on 10/31/2010 for this race.

NOTE: The RFAI indicates that the expense was for canvasser in support of Michael Bennet. LCV records and the LCV Year End report indicate that this expense was for parking in support of candidate Tom Perriello.

(13)Payment for printing in the amount of \$670.00 to A&B Printing and Mailing on 10/7/2010 in support of candidate Dina Titus. This expense combined with other expenses in this race did not trigger the \$10,000 threshold necessary to trigger a 48-hour report, and LCV correctly reported this expense in the LCV Year End report.

NOTE: The RFAI indicated that this expense was for canvasser in support of candidate Carol Shea-Porter. LCV records and the LCV Year End report confirm that this expense was for printing in support of Dina Titus.

(14)Payment for polling in the amount of \$10,000.00 to SEA Polling and Strategic Design on 10/7/2010 in support of candidate Joseph Sestak. LCV correctly reported this expense on LCVs Year End report, but due to an administrative error, the wrong LCV entity (LCV Action Fund) disclosed this expense in a 48-hour report filed on 10/29/2010.

NOTE: The RFAI indicates that this expense was for canvasser in support of candidate Carol Shea-Porter. LCV records, the LCVAf 48-hour report, and the LCV Year End report confirm that this expense was for polling in support of candidate Joseph Sestak.

Sincerely,

Patrick Collins, Senior Vice

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President, Finance & Administration
League of Conservation Voters, Inc.
